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December 14, 2021

The Honorable Michael B. Kaplan  
United States Bankruptcy Court, District of New Jersey  
Clarkson S. Fisher US Courthouse  
402 East State Street, Courtroom #8  
Trenton, NJ 08608

Re: LTL Management LLC, Case No. 21-30589 (MBK)

Dear Judge Kaplan:

This responds to Mr. Glasser's letter filed yesterday on behalf of the Talc Claimants' Committee ("TCC").

Mr. Glasser is incorrect when he states that the Debtor would not produce unredacted versions of the Board minutes on the basis of privilege. In fact, although privilege provided a basis for some of the redaction, the primary basis was relevance. During the meeting that is the subject of the minutes, the Board discussed many matters irrelevant to the corporate restructuring and LTL bankruptcy filing. As we have previously advised the TCC (multiple times) and repeated on the record at the discovery conference Your Honor convened on December 7, 2021, the Board of Johnson & Johnson did not approve, nor was it asked to approve, either the corporate restructuring or the LTL bankruptcy filing.

Nonetheless, the Debtor is willing to provide to the Court, for *in camera* review, the unredacted minutes so that the Court can confirm that the matters addressed by the Board were irrelevant to the issues raised by the TCC's motion to dismiss. The Debtor regrets that the Court has to incur time on an issue that could have been resolved through a further meet and confer.

On an unrelated note, the Debtor was advised yesterday by the TCC that it plans to have a number of its claimant members appear in Court tomorrow so that the TCC can "introduce" them. While the Debtor does not object to limited introductions of claimants who are present, it does object to claimants addressing the Court, and to attorneys on behalf of claimants making factual assertions concerning particularized allegations against the Debtor. No evidentiary hearing is scheduled for tomorrow and the TCC should not be permitted to effectively present

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testimony of harm without affording the Debtor the opportunity to make a commensurate showing that the harm is not attributable to its products. The Debtor raised this objection with TCC counsel yesterday and wants to note it on the record today.

Respectfully submitted,

  
by permission  
D. Stone

Gregory M. Gordon